

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

TRACY LEROY SMITH,

Plaintiff,

vs.

THOMAS TINKLEPAUGH, in his
individual capacity,

Defendant.

Civil Action No. 17-cv-12698

Hon. Arthur J. Tarnow

Mag. Judge R. Steven Whalen

Robert K. Gaecke, Jr. (P55829)
Attorney for Plaintiff
715 W. Michigan Ave., Ste. 1
Jackson, MI 49201
(517) 787-6400 / fax (517) 787-6402
rgaecke2@gmail.com

Audrey J. Forbush (P41744)
Rochell L. Clarke (P79054)
PLUNKETT COONEY
Attorneys for Defendant
Plaza One Financial Center
111 E. Court Street – Suite 1B
Flint, MI 48202
(810) 342-7014 / fax (810) 232-3159
aforbush@plunkettcooney.com

John P. Kobrin, Jr. (P24004)
Co-Counsel for Plaintiff
3010 Wildwood Ave Unit 3
Jackson, MI 49202
(517) 782-9451 / fax (517) 787-4020
jpkobrinjr@aol.com

PLAINTIFF’S WITNESS LIST

Plaintiff, through counsel, discloses the following individuals she may call as witnesses in the trial of this matter:

1. All Parties.
2. Michelle Barlund Smith.
3. Denise M. Heberle.
4. Agents and employees of The City of Jackson Police Department, including but not limited to Officer Grant, Officer Postma, Officer Mills, Officer Klimmer and Officer Ganzhorn.
5. Agents and employees of the Jackson County Sheriff's Department including but not limited to Deputy Rybicki.
6. Any and all witnesses contained on Defendant's Witness List.
7. All providers of medical care at Henry Ford Allegiance Hospital, f/k/a Allegiance Hospital, 205 N. East Ave., Jackson, MI 49201.
8. All providers of medical care at The Center for Family Health.
9. Any and all providers of medical care to Plaintiff otherwise not disclosed herein.
10. Agents, employees and/or records custodians of the 12th District Court, 4th Circuit Court and the Michigan Court of Appeals.
11. Potential audio/visual expert to be identified.
12. Potential police practices expert to be identified.
13. Agents, employees and/or records custodians of Relias Learning.

14. All witnesses necessary for foundational purposes in the entry of exhibits, including but not limited to “Records Custodians”.
15. Any and all rebuttal and surrebuttal witnesses.
16. Any and all witness not previously identified that may become necessary and/or known through the course of discovery.
17. Plaintiff reserves the right to take the *de bene esse* deposition of those witnesses unable to personally appear at trial.
18. Plaintiff the right to his Witness List to reflect the identity of witnesses learned through the process of discovery.

/s/ Robert K. Gaecke, Jr.
Robert K. Gaecke, Jr. (P55829)
Attorney for Plaintiff
715 W. Michigan Ave., Ste. 1
Jackson, MI 49201
(517) 787-6400 / fax (517) 787-6402
rgaecke2@gmail.com

/s/ John P. Kobrin, Jr.
John P. Kobrin, Jr. (P24004)
Co-Counsel for Plaintiff
3010 Wildwood Ave Unit 3
Jackson, MI 49202
(517) 782-9451 / fax (517) 787-4020
jpkobrinjr@aol.com

Dated: January 18, 2018

CERTIFICATION OF SERVICE

I, Robert K. Gaecke, Jr., certify that on January 18, 2018, I electronically filed with the Clerk of the Court using the ECF system, Plaintiff's Witness List and this Certification of Service, which will send notification of such filing to the following:

Audrey J. Forbush, Defendant's Counsel

Rochelle L. Clarke, Defendant's Counsel

and I hereby certify that I mailed by the United States Postal Service the document to the following non-ECF participants:

NONE

/s/ Robert K. Gaecke, Jr.
Robert K. Gaecke, Jr.
715 W. Michigan Ave., Ste. 1
Jackson, MI 49201
(517) 787-6400
rgaecke2@gmail.com
Attorney for Plaintiff
P55829

Dated: January 18, 2018